

# Exhibit B

**Dillon, Dennis**

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**From:** Kasulis, Telemachus  
**Sent:** Sunday, July 10, 2022 10:02 AM  
**To:** Zverovich, Olga (USANYS); Dillon, Dennis  
**Cc:** Pellegrino, Louis (USANYS); Kudla, Danielle (USANYS); Morris, Brian (USANYE); Hochron, Emily (USANYS) [Contractor]; Bailey, Matthew (USANYS) [Contractor]  
**Subject:** RE: [External] Defense Wire Calls

Hi Olga,

We certainly plan to admit some of them – which ones remains a question, probably in the same way that you don't currently intend to admit all of the government exhibits currently on your list.

If you have particular questions about particular excerpts, I would suggest you write them out in the manner in which we responded to your designations. I think that would prove the best way to tee up any issues. Generally speaking, if you're talking about hearsay we think several exceptions apply based on the declarations at issue including but not limited to state of mind/plan/motive, declaration against interest, present sense impressions, excited utterances. And of course, some of them are not for the truth of the matter asserted inasmuch as they are lies (or instructions or threats -- things that are neither true or false).

Thanks,

Tim

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**From:** Zverovich, Olga (USANYS) <Olga.Zverovich@usdoj.gov>  
**Sent:** Saturday, July 9, 2022 9:33 PM  
**To:** Kasulis, Telemachus <tkasulis@maglaw.com>; Dillon, Dennis <ddillon@maglaw.com>  
**Cc:** Pellegrino, Louis (USANYS) <Louis.Pellegrino@usdoj.gov>; Kudla, Danielle (USANYS) <Danielle.Kudla@usdoj.gov>; Morris, Brian (USANYE) <Brian.Morris2@usdoj.gov>; Hochron, Emily (USANYS) [Contractor] <Emily.Hochron@usdoj.gov>; Bailey, Matthew (USANYS) [Contractor] <Matthew.Bailey2@usdoj.gov>  
**Subject:** [External] Defense Wire Calls

Hi Tim and Dennis,

Do you plan to seek to admit the wire calls that you marked as defense exhibits as evidence at trial? If so, could you share with us on what theory/basis you plan to ask for their admission? If we have any disagreement on their admissibility, we'd rather try to sort it out now, or, if we can't, to front it for the Court in advance so we can avoid interruptions/sidebars mid-trial.

Thanks very much,

Olga

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